



NUCLEAR ENERGY INSTITUTE

Lynnette Hendricks
DIRECTOR, LICENSING
NUCLEAR GENERATION

October 18, 2002

Mr. Theodore R. Quay
Chief, Radiation Safety and
Emergency Preparedness Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Document Control Center

Project: 689

SUBJECT: Methodology for Development of Emergency Action Levels,
Final NEI 99-01, Rev. 4, September 2002

Request NRC Endorsement

Dear Mr. Quay:

The NEI Emergency Action Level Issue Task Force has finalized "Methodology for Development of Emergency Action Levels," NEI 99-01, Revision 4, September 2002. This document presents the methodology for development of emergency action levels (EALs) as an alternative to NRC/FEMA guidelines contained in Appendix 1 of NUREG-0654/FEMA-REP-1, Rev. 2, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," October 1980 and 10 CFR 50.47 (a)(4). Revision 4 consolidates the system malfunction initiating conditions and example EALs which address conditions that may be postulated to occur at nuclear power plants during plant shutdown conditions (Recognition Category C). Also included are initiating conditions and example EALs that fully address conditions that may be postulated to occur at permanently Defueled Stations (Recognition Category D) and Independent Spent Fuel Storage Installations (Recognition Category E).

Revision 4 was originally submitted to NRC for review and endorsement in August of 2000. Endorsement was delayed due to concerns related to Recognition Category D and E.

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Revision 4 is being resubmitted with a request for endorsement per Regulatory Guide 1.101 regardless of Recognition Category D and E. Changes to the September 2002 submittal of Revision 4 are limited as described below:

- Modifies HU4 to incorporate post September 11 security EAL changes based on the October 6, 2001 Safeguards Advisory Notice and the NRC's November 6, 2001 Information Assessment Team Recommended Actions in Response to a Site-specific Credible Threat at a Nuclear Power Plant. These EAL changes were endorsed by letter from NRR to NEI dated February 4, 2002.
- Modifies EAL 1 associated with HU3 and HA3 to more closely describe the Initiating Condition based on operating experience.

Enclosed for your endorsement in Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," is the Final Draft, "Methodology for Development of Emergency Action Levels," NEI 99-01, Revision 4, September 2002.

The industry appreciates the efforts that you and your staff made to revise the methodology. If you have any questions please contact Alan Nelson at (202) 739-8110 or by e-mail (apn@nei.org).

Sincerely,



Lynnette Hendricks

Enclosure

c: Kathy Halvey Gibson
Peter Wen